

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 15 C 3378
)	
WILLIAM BOWMAN, a/k/a BILL)	JUDGE EDMOND E. CHANG
BOWMAN, d/b/a COMMERCIAL)	
CARPET COMPANY OF ROCKFORD,)	
LLC, a dissolved limited liability company,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on June 16, 1998, request this Court enter judgment against Defendant, WILLIAM BOWMAN, a/k/a BILL BOWMAN, d/b/a COMMERCIAL CARPET COMPANY OF ROCKFORD, LLC, a dissolved limited liability company. In support of that Motion, Plaintiffs state:

1. On June 23, 2015, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.
2. Defendant has failed and refused to cooperate with the scheduling and completion of the required audit.
3. In lieu of the required audit of the Defendant's payroll books and records for the time period January 1, 2013 forward, this Court required Plaintiff Funds to estimate the monthly fringe benefit contributions due from Defendant.

4. Defendant has by its failure to submit monthly contribution reports for the months of April 2014 through July 2014, May 2016 and June 2016, concealed the number of hours for which contributions are due. Additionally, Defendant has had an employee covered by the collective bargaining agreement during the months of July 2015 through September 2015 and this employee has submitted check stubs showing the number of hours worked by him for the Defendant. Based upon a review of the Defendant's reporting history, and based upon the check stubs, it has been determined that a reasonable estimate of the concealed contributions due for the aforesaid months is \$32,559.58. (See Affidavit of Deborah L. French).

5. Additionally, the amount of \$3,255.96 is due for liquidated damages. (French Aff. Par. 8).

6. In addition, Plaintiffs have incurred costs of \$680.50 and \$3,532.50 in attorneys' fees, for a total of \$4,213.00, in this matter. (See Affidavit of Catherine M. Chapman).

7. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$40,028.52.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$40,028.52.

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 16th day of November 2015:

Mr. William Bowman
Commercial Carpet Company of Rockford, LLC
213 North Third Street
Rockford, IL 61107

Mr. William Bowman
Commercial Carpet Company of Rockford, LLC
815 N. Church Street, 2nd Floor
Rockford, IL 61103

/s/ Cecilia M. Scanlon _____

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